# United States District Court

| SOUTHERN                                                                                                                                                                                  | DISTRICT OF                   | NE'              | W YORK                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------------|-------------------------|
| KRONOZ INTERNACIONAL, INC.,                                                                                                                                                               |                               |                  |                         |
|                                                                                                                                                                                           | SUMMO                         | ONS IN A C       | IVIL CASE               |
|                                                                                                                                                                                           |                               | 1050 07.007      |                         |
| V.                                                                                                                                                                                        |                               | ABER: 07 CIV.    |                         |
| CUSTOM SOFT S.A. de C.V.,                                                                                                                                                                 | 07                            | CV               | 3079                    |
|                                                                                                                                                                                           |                               | umar             | VADI AN                 |
| TO: (Name and address of defendant)                                                                                                                                                       |                               | JUUUL            | KAPLAN                  |
| Custom Soft S.A. de C.V.<br>Reforma 1700 Col Ladron de Gue<br>Guadalajara, CP 44650, Mexico                                                                                               | vara                          |                  |                         |
| YOU ARE HEREBY SUMMONED and re-                                                                                                                                                           | quired to serve upon PLA      | INTIFF'S ATTOR   | RNEY (name and address) |
| Martin F. Casey<br>CASEY & BARNETT, LLC<br>317 Madison Avenue, 21st Floor<br>New York, New York 10017                                                                                     |                               |                  |                         |
|                                                                                                                                                                                           |                               |                  |                         |
| an answer to the complaint which is herewith served<br>summons upon you, exclusive of the day of service<br>the relief demanded in the complaint. You must also<br>of time after service. | ce. If you fail to do so, jud | igment by defau  |                         |
|                                                                                                                                                                                           |                               |                  |                         |
| J. MICHAEL McMAHO                                                                                                                                                                         | <u>AP</u>                     | R 17 <b>2007</b> |                         |
| Waris Quintero                                                                                                                                                                            | -                             |                  |                         |
| (BY) DEPUTY CLERK                                                                                                                                                                         |                               |                  |                         |

| Defendant.<br>X                                               |                              |
|---------------------------------------------------------------|------------------------------|
| CUSTOM SOFT S.A. de C.V.,                                     | VERIFIED COMPLAINT           |
| -against-                                                     | PLAINTIFF'S FIRST AMENDED    |
| Plaintiff,                                                    | 07 CV 3079 (LAK)<br>ECF CASE |
| KRONOZ INTERNACIONAL, INC.,                                   |                              |
| X                                                             |                              |
| UNITED STATES DISTRICT COURT<br>SOUTHERN DISTRICT OF NEW YORK |                              |

Plaintiff, Kronoz Internacional, Inc. (hereinafter referred to as "Plaintiff"), by and through its attorneys, Casey & Barnett, LLC, as and for its Verified Complaint against the Defendant, Custom Soft S.A. de C.V., (hereinafter referred to as "Defendant"), alleges, upon information and belief, as follows:

- 1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure and 28 United States Code § 1333.
- 2. At all times material to this action, Plaintiff, was, and still is, a foreign corporation duly organized and operating under the laws of Mexico, with an office and place of business located at Calle 18 No. 303 por 9, Fracc. Residencial Camara de Comercio Norte 97133 Merida, Yucatan, Mexico, and is engaged in the business of freight forwarding.
- 3. Upon information and belief, Defendant, was and still is a foreign business entity, organized and existing pursuant to the laws of Mexico with an office and place of business located at Reforma 1700 Col Ladron de Guevara, Guadalajara, CP 44650, and is an importer of goods for commercial sale.

### RELEVANT FACTS

- 4. Defendant, Custom Soft S.A. de C.V., engaged the services of plaintiff, Kronoz Internacional, to provide transportation for numerous shipments of cargo from the port of Chiwan, China to Manzanillo, Mexico, pursuant to Kronoz House Waybills numbered EVOKOSZ06800092, EVOKOSZ06800094, EVOKOSZ06800159, EVOKOSZ06800154, EVOKOSZ06900102, EVOKOSZ06900068, EVOKOSZ06900028, EVOKOSZ06900004, EVOKOSZ06A00019, EVOKOSZ06A00045, EVOKOSZ06A00084, EVOKOSZ06900161, EVOKOSZ06A000111, and EVOKOSZ06B00062.
- 5. The shipments of cargo, traveling under the above referenced waybills, were received into the care and custody of plaintiff and/or its agents at the aforementioned port of departure and duly transported to their intended port of destination.
- 6. Plaintiff dispatched invoices to the defendant, demanding payment of shipping freight owed for the transportation services provided. (Attached hereto as Exhibit 1 are copies of invoices sent to defendant.)
- 7. Despite repeated demands, defendant failed to pay shipping freight that was, and remains, due and owing and has, thereby, caused plaintiff to sustain damages in the total amount of \$101,971.
- 8. By virtue of the foregoing, defendant has breached the contracts of carriage to which it voluntarily entered.
- 9. The Defendant cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, but, upon information and belief, Defendant has, or will have during the pendency of this action, assets within this District subject to the jurisdiction of this Court, held in the hands of garnishees including, but not limited to ABN Amro, American Express Bank, Bank

of America, Bank of New York, Citibank, Deutsche Bank A.G., HSBC Bank USA, J.P. Morgan Chase, Standard Chartered Bank, and/or Wachovia Bank N.A., which are believed to be due and owing to the Defendant.

10. The Plaintiff seeks an Order from this Court directing the Clerk of the Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for certain Admiralty and Maritime claims, attaching *inter alia*, any assets of the defendant held by the aforesaid garnishees for the purpose of obtaining personal jurisdiction over the Defendant and to secure Plaintiff's claim as described above.

#### WHEREFORE, Plaintiff prays:

- A. That process in due form of law issue against Defendant, citing it to appear and answer under oath all and singular matters alleged in the Complaint;
- B. That since the defendant cannot be found within this District pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, this Court issue an Order directing the Clerk of the Court to issue Process of Maritime Attachment and garnishment pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, attaching all goods, chattels, credits, letters of credit, bills of lading, effects, debts and monies, tangible or intangible, or any other funds held by any garnishee including, but not limited to, ABN Amro, American Express Bank, Bank of America, Bank of New York, Citibank, Deutsche Bank A.G., HSBC Bank USA, J.P. Morgan Chase, Standard Chartered Bank, and/or Wachovia Bank N.A., which are due and owing to the Defendant, in the amount of \$101,971 calculated to date to secure the plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged in the Complaint;

- C. An Order recognizing and enforcing any final judgment rendered by a Mexican Court in Plaintiff's favor for the monies owed and the claims herein;
- D. That this Court retain jurisdiction over this matter through the entry of any judgment or award associated with any of the claims currently pending, or which may be initiated in the future, including any appeals thereof; and
- E. That Plaintiff has such other and further relief as the Court may deem just and proper.

Dated: New York, New York May 2, 2007 283-03

The Plaintiff,

Kronoz Internacional, Inc.

Bv:

Christopher M. Schierloh (CS-6644) CASEY & BARNETT, LLC 317 Madison Avenue, 21<sup>st</sup> Floor New York, New York 10017

Tel: 212-286-0225 Fax: 212-286-0261 cms@caseybarnett.com 

## EXHIBIT 1

2206-9098

FAC 00009805

FREERCADOR SHOPPER

KRONOZ

FECHA DATE 30/08/2006

MOTEX INDUSTRIES CORP. LIMITED

RM 1810 - 1811 BUILDING TO FULL FLALA **STANSDONG** 

Posición : DM08-0719-2006/01

FACTURADO A INVORCE TO-

5.55

CONSTRUCTARIO, DONS. DARE COSTOM SOFT S.A. DE C.V.

REFORMA 1700 COL LABRON DE GUEVARA GUADALAUREA OF 44550

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA GUADALAJARA CP 44650 R.F.C. C\$0040312001

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                      |                          | !                                          |                                                    |                                         |
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| SESSION SELECTION SELECTION CONTRACTOR CONTR |                      | BIL MAWS<br>MSCDCF673622 | FSL. HAWB<br>EVOKOSZ06800092               |                                                    |                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                      | Po 2:4                   | ADUANA: COSTON HOUSE.                      | DESTINO: DESTINATION SONZANTILO                    |                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                      | R - FREIGHT (NYOICE)     | REIGHT INVOICE: FLETS YERR INLAND FREIGHT: |                                                    | *************************************** |
| <u>MSCOB 4 7780 3 48845</u><br>MSCU7 255890                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | EULTÓS. 1208<br>4440 | DO FUNDAS DE PLAS        | NTENDO CONTENT<br>FICO                     | PESO SRUTO-<br>GROSS WEIGHT.<br>4 8233.01<br>Eggs. | 144.520                                 |

OCEAN FREIGHT

USD 7,476.00 Hi page 35- Newton Die - Le \$ 3 167-25

PARCIAL I.V.A. TOTAL

USD USD UZD

7,475.00 0.00 7,476.00

SERVICIOS PRESTADOS EN EL EXERANJERO

(SEVEN THOUSAND FOUR HUNDRED SEVENTY SIX US DOLLARS WITH 00/100)

411 South 12th Street Suite-53 Mc Allen, fx.



OCEAN FREIGHT

1.25 - 9C97

FAC 00009806

DVELRGADOR, SHIPPER FECHA: DATE: 30/08/2006 MOTEX INDUSTRIES CORP. LIMITED PM 1810 - 1811 BUILDING TO FULL FLAZA REF Posición : TMO8-0718-2006/01 **ತಿವಾಸಿಕಿಯರುಗಿತ** FACTURADO A INVOICE TO. CUSTOM SOFT S.A. DE C.V. SEMBLEMOS CIPATANO-ENCS REFORMA 1700 COL LADRON DE GUEVARA CUSTOM SOFT S.A DE C V. S/I PEFORMA 1700 COL LADRON DE GUEVARA GUADALAJARA CP 44650 GUADALAJARA CP 44650 R.F.C. C50040312CD1 DB/09/2006 FLETE / PREASHT TERMS CHITISAM MSC .... TERRANEAN SH KSC DEBRA/632A 51 LAWS FBL: HAWE MSCUCF673739 EVOSOSZOEBOO094 FACT COMERCIAL COMERCIAL AVV CHIRDEN CARSIN ADUANA : CUSTOM HOUSE DESTINO: DESTALATION MANZANILLO EVERTOR INT L FORMARDING CO. LTD. FLETE TERR I MILAND FREIGHT REDGAENTO MARCAS Y NEW / MARKS BULTOS: - POS: EGNTENDO CONTENT: PESO BRUTO ... GROSS WEIGHT PROMINER 195 65 MATERIA PRIMA 65.000 1168.50 Kgs.

> FARCIAL USD 4,453.75 I.V.A. USD 0.00 LATOT UZD 4,453.75

USD

4,453.75

SERVICIOS FRESTADOS EN EL EXTRANJERO (FOUR TEOUSAND FOUR HUNDRED FIFTY THREE US DOLLARS WITH 75/100)



7000-9-150

FAC 00010062

EVBARCADOR: (SHIPPER FECHA: DATE: 09/10/2005 5.25 MOTEX INCUSTRIES CORP. LIMITED Posición : TMD9-0751-2006/01 RM 1810 - 1811 BUILDING TO FULL PLAZA FACTURACIO AL INVIDICE TO: **ಆಗಿತ್ತಾರಿಗಿ**ತ CUSTOM BOFT S.A. DE C.V. CONSIGNATARIO CONSIGNEE REPORMA 1700 COL LADRON DE GUEVARA S/I CUSTOM SOFT S.A. DE C.V. GUADALAJARA CP 44650 REFORMA 1700 COL LADRON DE GUEVARA R.F.C. CS0040312CD1 GUADALAJARA CP 44650 PLETE: FREIGHT TERMS ETD: ETA: MARITIMO 22/09/2006 BUQUE SEL VUELS FLT Bit MANS FEL: HAKE 84.45PA (900) EVOROSEO6800159 MSCUCF712545 MSC LISA/0634 MSC MEDITERRANDAN SE ADUANA CUSTOM HOUSE DESTRIC: | DESTINATION . DRAZEN DATON FACT COMERCIAL COMERCIAL INV : MANZANTLLO CELMAY FACT, CORR. FREIGHT INVOICE FLETE TERR. ( INLAND FREIGHT: PEDIMENTO TORRESPONSAL - AGENT EVER-OR INT'L FORWARDING CO. LID. MARCAS Y NOE . MARKS BULTOS, PCS: CONTENSO. CONTENT: PESO BRUTO: / GROSS WEIGHT: CV: SEMILICY 57.300 MATERIA PRIMA 148 MSC07641358 3847.30 Kgs.

OCEAN FREIGHT

4.522.50

550

4,522.50 PARCIAL UZD 0.00 A.V.I USD 4,522.50 TOTAL USD

SERVICIOS FRESTADOS EN EL EXTRANJERO (FOUR THOUSAND FIVE HUNDRED THENTY TWO US DOLLARS WITH 50/160)

2006-9131

EMELACADDA : SHIPPER

FECHAL DATE: 09/10/2006

PEF

Posición : 1M09-0752-2006/01

FACTURADO AL INVOICE TO:

CONSIGNATARIO CONSIGNEE

**ಆಯಗೀತಾರಗಿ** 

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA

RM 1810 - 1811 EUILDING TO FULL PLACE

MOTEX INDUSTRIES CORP. LIMITED

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA

S/I

GUADALAJARA CP 44650 R.F.C. CS0040312CD1

| GUADALALARA OF 44650       |                                                |            |                                            |                          |                                     |                        |
|----------------------------|------------------------------------------------|------------|--------------------------------------------|--------------------------|-------------------------------------|------------------------|
|                            |                                                |            |                                            | ETD.: ETA:<br>22/09/2006 | PLETE / FREIGHT T                   | ERWS                   |
| NAVERA ESEC                |                                                | BUDLE . VE | E VUELO FLI                                | BI. NTWB                 | FSL HAWS.                           |                        |
| MSC MEDITERFANCIAN         | TERPANEAN SH MEC LISA/634A                     |            | MSCUCF712511                               | EVOROSZ06800154          |                                     |                        |
|                            |                                                | CHIMAN     | RIGEN CRIGN ADUANA CUSTON HOUSE<br>DETWAIN |                          | DESTRUC: DESTRIATION<br>MANUANTILLO |                        |
| CORRESPONSAL: AGENT        | CORRESPONSAL: AGENT FACT COAR FREIGHT INVOICE. |            | FLETE TERRY BILAND FREIGHT                 | PEDIMENTO                |                                     |                        |
| EVER-CH INT'L FORK         | arding                                         | CO. LTD.   |                                            |                          |                                     |                        |
| MARCAS Y Nos - MARKS       | EULT                                           | 5796       | CONTENDO : CONTENT                         |                          | PESO ERUTO:<br>GROSS WEIGHT         | VOLUMEN: VC<br>215.780 |
| MSCU9361340<br>MSCU9355267 | tendelika da, at i Criss                       | 2126       | MAJERIA FRIMA                              |                          | 65369.37<br>%gs.                    |                        |

OCEAN FREIGHT

TSD 11,051.00

PARCIAL USD 11,051.00 I.V.A. 0.00 USD TOTAL びまご 11,051.00

SERVICIOS PRESTADOS EN EL EXTRANJERO (ELEVER THOUSAND FIFTY ONE US DOLLARS WITH 00/100) 2006-10-067

EEF

FAC 00010066

EWEXROLDOR (SHIPPER)

FECHA DATE 09/10/2006

MOTEX INDUSTRIES CORP. LIMITED

RM 1610 - 1611 BUILDING TO FULL FLATA

GULKSDONG

Posición : DMD9-0829-2005/01

FACTURADO A: WYOKEE TO:

DINERBYATARIO CONSIGNEE

OCEAN FREIGHT

CUSTOM SOFT S.A. DE C.V. REPOSMA 1700 COL LADRON DE GUEVARA GUADALAJASA OF 44650

COSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA S/I

GUADALAJARA CP 44650 R.F.C. CS0040312CD1

| :                           |                           |                                       | E7D∷ ETA:<br>19/10/2006              | PLETE FREIGHT TERMS                  |  |  |  |
|-----------------------------|---------------------------|---------------------------------------|--------------------------------------|--------------------------------------|--|--|--|
| NAMERA SECO                 | MSC ELA/638               |                                       | EARRAWE<br>MSCUCP855989              | FSL: HAWS:<br>EVOKOSZO6900102        |  |  |  |
| FACT COMERCIAL COMERCIAL NV | ORIGEN - ORIGIN<br>CETHAN |                                       | ಎರ⊔ವಿಸುವ : ರಚಿತ್≀ರೆ <b>ಸ</b> ∺ರಚಿತ≧: | DESTINO: DESTINATION:<br>MRNZANTILLO |  |  |  |
| CORRESPONSAL LAGENT FACT CO |                           | JAHT NYOICE                           | FLETE TERRY CIRLAND FREIGHT          | PEDMENTO                             |  |  |  |
| EVER-OR INT'L FORWARDI      | RG CO. LID S              | / <u>T</u>                            |                                      |                                      |  |  |  |
|                             |                           | TENIDO CONTEXT: PESO ERUTO GROSS WEIG |                                      | YOLLMEN. W                           |  |  |  |

217.350 MATERIA PRIMA 5066 KSC09599072 63756.40 MSCUS442756

Kgs. MSC07907263

> 11,151.00 USD

11,151.00 FARCIAL USD I.V.A. ರತರ 0.00 11,151.00 UED TOTAL

SERVICIOS FRISTADOS EN EL EXTRANJERO (ELEVEN TROUSAND SUNDRED FIFTY ONE US DOLLARS WITE 80/100)

## 2006-10-034

INTERNATION VE

EVEARCADOR / SHIPPER-

FECH4: DATE 11/10/2005

MOTER PRODUSTRIES CORP. LIMITED

RM 1810 - 1811 BUILDING TO FULL PLAZA CUANCDONG

Posicián : TM09-0826-2006/01

FACTURADO A. INVOICE TO

DOME GLATARIO - CONSIGNEE

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA GUADALATARA OF 44680

CUSTOM SOFT S.A. DE C.V.

REFORMA 1700 COL LADRON DE GUEVARA

S/I

GURDALAJARA CP 44650 R.F.C. CS0040312CD1

|                                                                           |       |                        |                         | ETD: ETA:<br>02/10/2006       | PLETE PREMONT TO<br>MARITIMO   | R⊯S         |
|---------------------------------------------------------------------------|-------|------------------------|-------------------------|-------------------------------|--------------------------------|-------------|
| MAN ERA SSCO BUDGE: VEL. VUELO. FLT: MSC MEDITERRAMEAN SH MSC FRAGUE/636A |       |                        | EL MANT<br>MSCUCE748879 | FSL: HAWE<br>EVOROSZ06900028  |                                |             |
|                                                                           |       | ORISEN DRISM<br>CHIWAN |                         | ADUANA: CUSTON HOUSE:         | DESTINO DESTINATION MANIANILLO |             |
| EVER-OK INT'L FORWARDING CO.                                              |       | ;                      | . FREISHT NYOICE.       | PLETE TERR: ( INLAND FREISHT) | PEDINENTO:                     |             |
| WARCAST NO 1/WARKS. TRIU9150220                                           | висто | 362B                   | CONT<br>MATERIA PRIMA   | ENDO: / CONTENT:              | FESO SRUTO.:<br>CRUSS WEIGHT.  | VOLUMEN /√O |
| VSC53155330                                                               |       | B.V 11 -               |                         |                               | 45350.00                       |             |

OCEAN FREIGHT

USD 7,476.00

Kgs.

4

Parcial USD 7,476.00 I.V.A. לפט 0.00 7,475.00 USD TOTAL

SERVICIOS PRESTADOS EN EL EXTRANJERO (SIVEN TEOUSAND FOUR EUROPED SEVENITY SIX US DOLLARS WITE 00/100)

## 2006-9208

1527112277

EVERROLDER SHIFFER

FECHA DATE20/10/2006

MOTEX INDUSTRIES CORP. LIMITED

PM 1810 - 1811 BUILDING TO FULL PLAZA

GUZNGDONG

Posición : IMO9-0778-2006/01

FACTURADO A . INVOICE TO:

CONSIGNATIANO CONSIGNES

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA

GUADALAJARA CP 44650

CUSTOM SOFT S.A. DE C.V.

REFORMA 1700 COL LADRON DE GUEVARA

S/I

GUADALAJARA CP 44650 R.F.C. CS0040312CD1

| . Government of the control                                                   |                       |                       | \                           |                                                |                       |
|-------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------------|------------------------------------------------|-----------------------|
|                                                                               |                       |                       | ETD - ETA<br>24/09/2005     | PARTY PRO                                      | . ERUS:               |
| MINISTA SSCO SUGGET VSC - VUELOT FLT MISC MEDITERRANEAR SE MISC POH LIN/635 A |                       | M2COCLO E000004       | FBL HAWE<br>EVOROSZO6900004 |                                                |                       |
| FACT COMERCIAL COMERCIAL INV CRISEN FO                                        |                       | DRISM                 | ADUANA - CUSTON HOUSE       | DESTING DESTINATION                            |                       |
| CORRESPONSAL AGENT. FACT DORR OFRESCHT<br>EVER-OK INT'L FORWARDING CO. LTD.   |                       | R / FREIGHT (ATVOICE) | PLETE TERR / WEARD PREMIT   | PEDMENTO.                                      |                       |
| MARCIS V NSW: "MARKS.  MSCUB549890  MSCU7136818                               | 8ULTOS: +PCS-<br>4307 | MATERIA PRIMA         | ONTENIDO: CONTENT:          | PESO ERUTO:<br>GROSS WEGAT<br>47605.00<br>Kgs. | VOCUSIEN V<br>146.100 |

OCEAN FREIGHT

**೮**5೨ 7,476.00

USD 7,476.00 PARCIAL 0.00 USD I.V.A. 7,475.00 USD TOTAL

SERVICIOS PRESTADOS EN EL EXTRANJERO (SEVEN THOUSAND FOUR HUNDRED SEVENTY SIX US DOLLARS WITH 00/100)

2006-11-036 KRONOZ SILKNALIONAL EMEAREADOR : SHIPPER

FECHA DATE: 30/10/2006

REF ..

Posición : 140-0949-2006/01

FACTURADO A: / INVOICE TO:

CUSTOM SOFT S.A. DE C.V. TONSIGNATARIO CONSIGNEE REFORMA 1700 COL LADRON DE GUEVARA

**GUALIGDONG** 

MOTEX INDUSTRIES CORP. LIMITED

RM 1810 - 1811 BUILDING TO FULL FLATA

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA GUADALAJARA OP 44650

S/I GUADALAJARA CP 44650 R.F.C. C\$0040312CD1

| :                                                                                 |        |                     |                          | ETD::ETA:<br>31/10/2006           | FLETE: FREIGHT T<br>MARITIMO | er <b>u</b> s         |
|-----------------------------------------------------------------------------------|--------|---------------------|--------------------------|-----------------------------------|------------------------------|-----------------------|
| MSC MEDITERRANEDN SE BUQUE: VSL (VUELO, FLT MSC MEDITERRANEDN SE MSC FABIENE/640A |        |                     | eu: Mawe<br>MSCUCF955882 | FBL:(HAWE:<br>EVOKOSZOEA00019     |                              |                       |
| FACT COMERCIAL COMERCIAL SAY. DRIGEN CRISH CHINDAN                                |        |                     | ADURNA: / CUSTOM HOUSE:  | DESTINO: / DESTINATION MANZANILLO |                              |                       |
| TIPRESPONSAL AGENT<br>EVER-OK ENT L FORWARD                                       | DING C | FAST CON<br>O. LTD. | R FRESHT MYCKE           | FLETE TERR: - NULANO FREIGHT.     | PEDWENTO                     |                       |
| MARCAS Y NOL. MARKS<br>MSCU7281740<br>MSCU9680630                                 | BULTO  | 3628                | MATERIA PRIMA            | <br>NEO / CONTENT:                | PESO BRUTO: GROSS WEIGHT     | VOLUMENT V<br>145.120 |

OCEAN FREIGHT

USD 7,376.00

Kgs.

11

PARCIAL USD 7,376.00 USE I.V.A. 0.00 TOTAL JSD 7,375.00

SERVICIOS PRESTADOS EN EL EXERANJERO

(SEVEN THOUSAND THREE SUNDRED SEVENTY SIX US DOLLARS WITH 00/100)

KRONOZ

FAC 00010311

### 2006-11-037

EMEARCADOR, SAPPER FECHA DATE 30/10/2005 MOTEX PROUSTRIES CORP. LIMITED Posición : IMID-0949-2006/01 RM 1810 - 1811 BUILDING TO FULL PLAIA FACTURADO AL INVOICE TO: GETANGEDONG CUSTOM SCET S.A. DE C.V. CONSIGNATIANO CONSIGNES: FEFORMA 1700 COL LADRON DE GUEVARA COSTOM SOFT S.A. DE C.V. S/I REFORMA 1700 COL LADRON DE GUEVARA GUADALAJARA CP 44650 R.F.C. CS0040312CD1 GUADALAJARA OP 44650 ETD-/ETA: FLETE: / FREIGHT TERMS: 05/11/2006 **PARITINO** EAL MANS: FEL: HAWE: BUDGE INSL. - VUELD: FLT. NAVIERA . 5500. EVOROSZO6A00045 MSC LORENT/S/I MSCUCF972511 MSC MEDITERRAMEAN SE DRIGEN : DRIGIN: ADUANA: CUSTON HOUSE: CESTINO DESTINATION: FACT COMERCIAL: COMERCIAL BN: MANZANILLO CHIMAN COPRESPONSAL LAGENT. FACT CORR | FREIGHT INVOICE PLETS TERR - INLAND FREIGHT-PETRMENTO EVER-OK INT'L FORWARDING CO. LID. -BULTOS: PCB CONTENESO . CONTENT PESO BRUTO: : GROSS WEIGHT POLUMENT IN MARCAS Y Nos : ! MARKS 72.560 MATERIA PRIMA GST07874934 1814 22675.00 Kçs.

OCEAN FREIGHT

CSD 3,751.00

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PARCIAL **DED** 3,751.00 0.00 I.V.A. USD TOTAL 3,751.00 USD

SERVICIOS PRESTADOS EN EL EXTRAMJERO (TERRE TEOGRAPO SEVEN HUNDRED FIFTY ONE US DOLLARS WITH 00/100)

KRONOZ FRACIONAL EVELPCADOR: SHIPPER

FECHA! DATE: 30/10/2006

MOTEX INDUSTRIES CORP. LEMETED

RM 1810 - 1811 BUILDING TO FULL FLAZA *ಆರಾಗವಾಂಚತ* 

Postción : 7M10-0951-2006/01

REF.

FACTURADO AL INVOSCE TO.

CONSIGNATARIO CONSIGNEE:

CUSTOM SOFT S.A. DE C.V.

REFORMA 1700 COL LABRON DE GUEVARA

GUADALAJARA CP 44650

CUSTOM SOFT S.A. DE C.V.

REFORMA 1700 COL LADRON DE GUEVARA

S/I

GUADALAJARA CP 44650

R.F.C. CS0040312CD1

|                      |                                                 |                           |                       | 1                                   |                               |            |
|----------------------|-------------------------------------------------|---------------------------|-----------------------|-------------------------------------|-------------------------------|------------|
|                      |                                                 |                           |                       | ETD. FETA:<br>CB/11/2006            | FLETE / FREIGHT 1             | ERKS:      |
| NAV BRA - SSCO       | NAV SRA - SSCO SUGUE: / VSC: / VUELO: FLT       |                           |                       | BILL: MAWE:                         | FBL ! KAWB                    |            |
| MSC HEDITERRANEAN    | C MEDITERRANIAN SE MSC CLAUDIA/642              |                           | UDIA/642              | MSCUCE993723                        | EVOKOSZOEA00084               |            |
| CHIMAN CHIMAN CHIMAN |                                                 | CHIMAN DULKA, CUSTON HOUS |                       | DESTINO, I DESTINATION. YANZANTILLO |                               |            |
| CORRESPONDAL: AGENT: | DERESPONEAL: ASENT: FACT. CORR 1: FREISHT INVOI |                           | R 1: FREISHT INVOICE: | FLETE TERR: (INLAND FREIGHT)        | PEDIMENTO:                    |            |
| IVER-OR INT'L FORK   | arding                                          | CO. LTD.                  | -                     |                                     |                               |            |
| MARCAS Y NOS - MARKS | BULTO                                           | S. PCS                    | 7403                  | FEREDO CONTENT-                     | PESO BRUTO /<br>GROSS WEIGHT: | VOLUMEN IV |
| MSC04060025          |                                                 | 5754                      | MATERIA PRIMA         |                                     |                               | 198.870    |
| MSCU7054561          | ć                                               |                           |                       |                                     | 71131.32                      |            |

OCEAN FREIGHT

MSCU7054561 MSCU8580745

> 10,826.00 USD

Κφs.

10,826.00 PARCIAL USD I.V.A. USD 0.00 ŪSD 10,826.00 TOTAL

SERVICIOS PRESTADOS EN EL EXTRANJERO (TEM THOUSAND BIGHT HUNDRED TWENTY SIX US DOLLARS WITH 00/100) Case 1:07 cv-03079-LAK Document 17-2 Filed 11/01/2007 Page 17 of 19

2006-10-133

FAC 00010324

31/10/2006

MOTEX INDUSTRIES CORP. LIMITED RM 1810 - 1811 BUILDENS TO FULL PLACE GUANGBONG

Posición : TMID-0876-2006/01

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA

REFORMA 1700 COL LADRON DE GUEVARA S/I

GUADRIAJAFA CP 44650 R.F.C. CS0040312CD1

CUSTOM SOFT S.A. DE C.V.

26/10/2006

MARITIMO

MSC MEDITERRANTAN SH MSC ORNELA/639A

FURNALAJARA OF 44650

MSCUCE886430

EVOKOSZ06900161

CETWAN

MANIANTILLO

EVER-OK INT'L FORWAPDING CO. LTD. - S/I

MSC09356745 MSC09428803

3628 MATERIA PRIMA

72.560

久

22675.00 Kgs.

OCEAN FREIGHT

USD 7,476,00

USD 7,476.00 USD 0.00 USD 7,476.00 PARCIAL I.V.A. TOTAL

SERVICIOS PRESENDOS EN EL EXTRANJERO

(SEVEN TROUSAND FOUR HUNDRED SEVENTY SIX US DOLLARS WITE 00/100)

09/11/2006

MOTEX INDUSTRIES CORP. LIMITED RM 1810 - 1811 EUTIDENS TO FULL PLAZA GUANGDONG

Posición : TM11-0995-2006/01

CUSTOM SOFT S.A. DE C.V.

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA GUADALAJARA CP 44650

REFORMA 1700 COL LADRON DE GUEVARA GUADALAUARA CP 44650 GUADALAJARA CP 44650

R.F.C. CS0040312CD1

22/11/2006

MARITIMO

MONTEMAR MARÍTEMA, S MSC LUDOVICA/643

MSCUMW113586

EVOKOSZO SACCOLLL

CELPTY

MANZANILLO

TEE08694498 TTLU7145765

3700 FUNDAS DE PLASTICO

141.500

44681.00 kgs.

OCEAN FREIGHT

CZU

7,376.00

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PARCIAL 7,376.00 USD I.V.A. USD 0.00 TOTAL USD 7,376.00

SERVICIOS PRESTADOS EN EL EXTRANJERO

(SEVEN TECUSAND TEREE EUNDRED SEVENTY SIX US DOLLARS WITE 00/100)

05/12/2005

MOTER INDUSTRIES CORP. LIMITED RM 1810 - 1811 BUILDING TO FULL FLADA GUANGDONG

Posición : IM11-1032-2006/01

CUSTOM SOFT S.A. DE C.V.

REPORMA 1700 COL LADRON DE GUEVARA

SURDALAJARA CP 44650 GUADALAJARA CP 44650

CUSTOM SOFT S.A. DE C.V. REFORMA 1700 COL LADRON DE GUEVARA GUADALAJARA CP 44650

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TOTAL

R.F.C. CS0040312CD1----

14/12/2006

MARITIMO

MSC NOA/0654

MSCUEW1 63482

EVOROS206B00062

CHIWAN

MANZANILLO

EVER-OR ENT'L FORWARDING CO. LTD. - S/I

MSCD4083820

3000 MATERIA PRIMA

57.550

26100.00 Kgs.

OCEAN FREIGHT

USD 3,576.00

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PARCIAL USD 3,576.00 USD 0.00 USD 3,576.00 I.V.A.

SERVICIOS PRESTADOS EN EL EXTRANJERO (THREE TROUSAND FIVE BUNDRED SEVENTY SIX US DOLLARS WITH 00/100)